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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA, CR No. 11-85-HA

Plaintiff,

**UNOPPOSED MOTION TO CONTINUE
TRIAL DATE**

vs.

MELVIN JAMES BOLDS,

Defendant.

The defendant, Melvin James Bolds, through counsel, Susan Russell, respectfully moves this Court for an order continuing the trial date in the above-entitled case for 90 days. Trial is currently scheduled for November 15, 2011. The additional time is needed to complete pretrial investigation in this case, to complete research into possible defenses,

research and file appropriate legal motions, consult with Mr. Bolds, and otherwise prepare for trial. Investigation, including witness interviews and the gathering of a number of mitigating records, is ongoing and has not yet been completed. This work cannot be completed by the current trial date.

The government, through Assistant U.S. Attorney Scott Kerin, has no opposition to the motion.

Mr. Bolds understands that this motion will result in excludable delay under the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). Mr. Bolds does not object to the continuance and requests the granting of the motion.

The delay will be excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), because additional time is needed to complete investigation and research, and the ends of justice are better served by the granting of the continuance and outweigh the best interests of the public and the defendant in a speedier trial.

RESPECTFULLY SUBMITTED this October 24, 2011.

/s/ Susan A. Russell
Susan A. Russell
Attorney for Defendant